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Mayor

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Commissioner of Health

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7/27/2017

Mr. Jose Rodriguez  
City of Milwaukee Health Department  
841 N Broadway Rm. 304 Milwaukee, WI 53202

&

Mr. Anthony Goodman  
City of Milwaukee Department of Neighborhood Services  
841 N Broadway RM. 105 Milwaukee, WI 53202

Ross Stitely  
Sherman Associates  
233 Park Ave South Ste. 201 Minneapolis, MN 55415

**Dear Mr. Stitely:**

The City of Milwaukee Health Department (MHD) and the Department of Neighborhood Services (DNS) are requiring clarification/additional information regarding the "Barclay Project", pertaining to all on-site activities related to the advancement of proposed construction/development at the sites of 300 S. Barclay Avenue and 139 E Oregon St, Milwaukee, WI. 53204. The Health and Safety Plan (HASP) provided by Key Engineering Group, dated June 2017, Project #1701-0785, states, "All KEY and subcontractor personnel must adhere to the procedures outlined in this HASP during the performance of their work."

The Departments' questions are as follows, are all personnel who enter the sites to perform work on the Barclay Project under the authority of this HASP, or only those of KEY Engineering Group and their sub-contractors? If activities to advance this project are planned or on-going, and are not under the authority of this HASP, please provide the following :

- A copy of the site specific safety and health plan(s), (HASP(s)), as defined and specified in 29CFR 1910.120(b)(4), for any and all current and/or next phases of activities in advancement of the Barclay Project. Please provide a comprehensive set of HASP's for all activities not under the authority of the HASP mentioned above.
- The Departments have been provided activity reports from Key Engineering Group detailing ongoing or proposed activities by Key and sub-contractors. It is similarly unclear if these

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activity reports are comprehensive of all activities in advancement of the Barclay Project. If not, in the future, MHD and DNS want to know about activities which are conducted under the authority of a different HASP(s), and which HASP pertains to each activity.

- Results of all chemical and physical analyses performed after June 20<sup>th</sup>, 2017, pursuant to the hazardous waste investigation of the site. Please provide these analyses on an ongoing basis as results are obtained.

Our review of environmental data submitted for the property (SET, Sept 29, 2016), indicates at least two widespread, high-concentration sources of metals in buildings 11,33, and 34: metals in existing bulk dust, and metals imbedded in structures. While it may be possible to remove the existing bulk dust hazard from the buildings, metals embedded in concrete and wood structures represent a secondary and concentrated source subject to release, as dust, during any future building work involving drilling, abrasion, demolition, or from structural deterioration.

It is not feasible to evaluate the hazards associated with metals embedded in the building structures using normal screening methods. Therefore, some form of Activity-Based Sampling [based on methods developed by NIOSH] will need to be devised to evaluate this hazard. Please develop and submit a plan to evaluate airborne and settled dust hazards resulting from work involving the drilling, abrasion, or structural disturbance of metals presently embedded in concrete and wood building structures.

Please respond to these requests by August 25<sup>th</sup>. You may send all documents to Mr. Jose Rodriguez at the address above. If you have questions or want to discuss this further, please contact Mr. Goodman (414-286-5026) or Mr. Lindor Schmidt (414-286-2359)

Sincerely,

Mr. Jose Rodriguez  
Emergency Response Planning Coordinator/Safety Officer  
City of Milwaukee Health Department

Mr. Anthony Goodman  
Environmental Code Supervisor  
City of Milwaukee Department of Neighborhood Services

cc: Toni Schoen - Key Engineering